

STATE OF NEW YORK  
COUNTY OF ERIE

JESSICA BRANT, being duly sworn, deposes and says:

1. I was a pretrial detainee in the Erie County Holding Center from approximately September 29, 2005 to October 3, 2005.
2. I was initially held in the booking cell from the time I was arrested on September 29<sup>th</sup> to October 2<sup>nd</sup>. I shared the room anywhere from 8 to 12 people over the four days and there was not enough room for people to sit down.
3. There was one toilet and one sink. The toilet had feces around it and the sink was turned on and off throughout the time I was there. There was a strong odor of urine and body odor.
4. I ran out of toilet paper. I asked the deputies for more, and they would not come back with any for many hours.
5. The only drinks that we were given were when breakfast, lunch, and dinner were served. I tried to drink from the sink, but it was turned off most of the day. The garbage from our meals remained on the floor. No one came to clean it up until days later. There were wrappers, tissues, and garbage all over the floor.
6. There were no cots or blankets. I was cold the entire time. I asked for blankets and was told "No." Women were sleeping in paper bags to keep warm. No one had any blankets.
7. I was in a car accident the day of my arrest and received ten stitches on my face. I asked three or four times a day since I was incarcerated to see the doctor and for pain medications. I was in substantial pain because of my injuries to my face and mouth. I was not given any medicine. My stitches were infected. I was told by the deputies that they would "put the word in" about my request to see the doctor.
8. I was told repeatedly that I would be moved up to a floor and out of the booking cell, but this did not occur until late on October 2<sup>nd</sup>. I was then moved to the Delta Floor.

9. I saw the doctor for the first time on October 2<sup>nd</sup>. The doctor said my stitches were infected and that the C.O. should have let me see her when I first arrived.
10. My mother took me to a doctor the day I was released. I am still under the care of a doctor for the infection.

  
JESSICA BRANT

Sworn to before me this 7<sup>th</sup> day of  
October, 2005

  
NOTARY PUBLIC

SHERITA PRUITT  
No. 01PR6128492  
Notary Public, State of New York  
Qualified in Erie County  
My Commission Expires June 27, 2009